

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

LUANN PARKER,

Plaintiff,

v.

AVENTIS S.A.
Espace Europeenne
de l'Entreprise 67300
Schiltigheim, France

and

AVENTIS PASTEUR, INC.
(a wholly owned subsidiary of Aventis S.A.)
Box 187 Discover Drive
Swiftwater, Pennsylvania 13670

Defendants.

) Case No. C-1-00-766

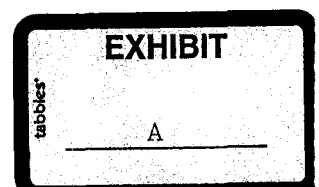
) Judge J. Dlott

) AFFIDAVIT OF WILLIAM PAUL
) GLEZEN, M.D.

* * *

William Paul Glezen, being first duly sworn, deposes and says as follows:

1. I am an adult over eighteen (18) years of age. I am a medical doctor licensed to practice medicine in Texas and I am Board Certified in Pediatrics and Epidemiology. Presently, I am an Adjunct Professor of Epidemiology at the School of Public Health, University of Texas Health Science Center at Houston, and a Professor of Molecular Virology and

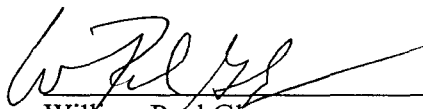


Microbiology at Baylor College of Medicine in Houston, Texas. My qualifications are contained in the curriculum vitae attached as Exhibit 1 to this Affidavit.

2. During my professional career, I have studied, lectured on and written medical articles on influenza and influenza vaccines. I am also very familiar with the medical literature and the epidemiological studies concerning the potential adverse effects of influenza vaccine.

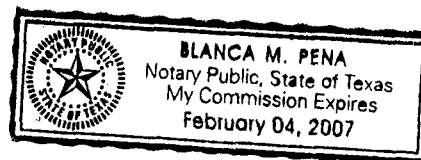
3. To the best of my knowledge, there are no epidemiological studies in existence today which establish a causal link between the influenza vaccine, including but not limited to the FLUZONE influenza vaccine produced by Defendant Aventis Pasteur Inc., and acute disseminated encephalomyelitis, a neurological disorder that is often referred to as ADEM,

Further affiant sayeth naught.


William Paul Glezen

Sworn to and subscribed in my presence this 20 day of May, 2004.


Notary Public



CURRICULUM VITAE

Revised 05/07/04

Name: William Paul Glezen, M.D.

Social Security No [REDACTED]

Address: Department of Molecular Virology and Microbiology
(Influenza Research Center)
Baylor College of Medicine (Room 227D)
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Houston, Texas 77030-3498

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Date and Place of Birth: [REDACTED] Oblong, Illinois

Marital Status: Married; 2 children

Education: B.S., Purdue University, 1953
M.D., University of Illinois, 1956
Epidemiology Summer Session, Univ. of Minnesota, 1979 and 1981

Employment:

1956-57	Intern, Wayne County General Hospital, Eloise, Michigan
1957-59	Epidemic Intelligence Service Officer, CDC, PHS, assigned to North Carolina State Board of Health, Raleigh
1959-60	Resident, Pediatrics, Hurley Hospital, Flint, Michigan
1960-61	Resident, Pediatrics, North Carolina Memorial Hospital, Chapel Hill, North Carolina
1961-62	Chief Resident and Instructor, Pediatrics, University of North Carolina, Chapel Hill
1962-65	Medical Epidemiologist, Respiratory and Enteric Virus Diseases Unit, 62-64; Chief, Respiratory and Enteric Virus Unit, 1964-65, Kansas City Field Station, CDC
1962-65	Senior Surgeon (Commander), Communicable Disease Center, Public Health Service
1963-65	Instructor, Department of Microbiology, University of Kansas School of Medicine
1965-69	Assistant Professor of Pediatrics, University of North Carolina School of Medicine, Chapel Hill, North Carolina
1968-75	Chief, Pediatric Service, Gravelly Hospital, Chapel Hill, North Carolina
1969-75	Associate Professor of Pediatrics, University of North Carolina School of Medicine, Chapel Hill, North Carolina
1974-75	Visiting Associate Professor of Pediatrics, Harvard Medical School and Associate in Infectious Diseases Children's Hospital Medical Center, Boston

1975-77	Associate Professor, Department of Microbiology and Immunology, and Pediatrics, Baylor College of Medicine, Houston, Texas
1977-1999	Professor, Departments of Microbiology and Immunology, and Pediatrics, Baylor College of Medicine, Houston, Texas
1976-Present	Attending Pediatrician, Harris County Hospital District Medical and Dental Staff, Houston, Texas
1977-Present	Courtesy Staff, Infectious Diseases, Texas Children's Hospital, Houston, Texas
1982-Present	Adjunct Professor of Epidemiology, School of Public Health, University of Texas Health Science Center at Houston
1989-1999	Head, Preventive Medicine Section, Departments of Microbiology and Immunology, and Pediatrics, Baylor College of Medicine
1999-present	Professor, Molecular Virology and Microbiology; Prof. & Head, Preventive Medicine Section, Department of Pediatrics, BCM

Honorary Societies and Honors:

Alpha Omega Alpha, 1956

2004 Distinguished Physician Award, Pediatric Infectious Disease Society

Praxis Biologics Academic Visiting Professor to the University of South Alabama, March 16-18, 1987

John Fox Memorial Lecture: Univ. of Washington School of Public Health, Feb 25, 1997

Commissioner's Special Citation, Food and Drug Administration, May 9, 1997

Presidential Guest Lecturer, Infectious Diseases Society for Obstetrics and Gynecology, August 6, 1998

22nd Annual Arthur E. McElfresh Memorial Lecture, St. Louis University, Nov 1, 2000

31st Lori Haker Visiting Professor, Lori Haker Memorial Lectures, Children's Hospital of Wisconsin, Milwaukee WI, April 3&4, 2003

Boards:

American Board of Pediatrics, 1963
American College of Epidemiology, 1981

Professional Societies:

American Academy of Pediatrics
American Thoracic Society, NC Representative Councilor, 1972-74
Infectious Diseases Society of America
Texas Infectious Diseases Society
Society for Pediatric Research
American Pediatric Society
American Epidemiological Society
Infectious Diseases Society for Obstetrics and Gynecology

Research Support:

1. Principal Investigator - Research Grant entitled "**Host Factors in Pathogenesis of Respiratory Diseases**" funded by the National Heart, Lung and Blood Institute, 3/1/72-6/30/81.
2. Associate Investigator and Epidemiologist - Acute Viral Respiratory Disease Unit (Influenza Research Center) Contract, NIAID, 1990-1995
3. Associate Investigator, Vaccine and Treatment Evaluation Unit, NIAID, 1975-98
4. Principal Investigator, Evaluation of Purified Fusion Protein Vaccine (PFP-1) for RS Virus, Praxis 1989-90.
5. Principal Investigator, Contract #N01-AI-15126 for "**Maternal Immunization for the Prevention of Infectious Diseases in Neonates and Infants**" awarded 9/30/91 for 5 years. Renewal (#N01-AI65316) on 9/30/96 for 5 years through 9/29/2001. Extended through August 31, 2003
6. Principal Investigator, RO1 grant: "**Control of Epidemic Influenza**", NIH grant awarded 09/15/97 thru 08/31/2004.

Service on Advisory Committees:

Temporary Advisor, **World Health Organization**, Geneva, February 9-12, 1999

Liaison Representative of the Infectious Diseases Society of America to the Immunization Practices **Advisory Committee (ACIP)**, 1993-1998

Member, **Consultative Group for Vaccine Development**, National Vaccine Program, February 1991 to 1993.

Member, Influenza Technical Advisory Group, **Medicare Demonstration Project**, Health Care Financing Administration, February, 1990 to 1993.

Medical Expert, **Childhood Vaccine Injury Program**, Department of Health and Human Services, January 1990 to present.

Member, National Research Council Committee on **ARI in Third World Children**, March 1989 to 1993.

Member, **Immunization Practices Advisory Committee (ACIP)** of the Centers for Disease Control, February 1987 to June, 1990.

Member of the **Epidemiology and Disease Control Study Section**, NIH, July 1985 to June, 1989.

Ad Hoc consultant for the NIAID **Microbiology and Infectious Diseases Review Committee**.

Ad Hoc member of site visit teams (3) for **NHLBI Pulmonary Specialized Centers for Research**.

Ad Hoc consultant to the **Infectious Diseases Committee of the American Academy of Pediatrics**.

Ad Hoc consultant, **Maternal and Child Health Research Committee**, NIH, 1981.

Consultant, **Evaluation of Progress and Research Needs in Pediatric Pulmonary Disease - Reactive Airways Disorders** NHLBI 1981-82.

Consultant, Review Committee for **Studies of the Defense Functions in the Developing Respiratory System**, June 1983.

Consultant, Review Committee, **Pediatric Pulmonary Specialized Centers of Research**, NHLB Institute, NIH, 1980-81.

Academic and Hospital Responsibilities:

1. Departmental Executive Faculty Committee - 1989-1999
2. Departmental Faculty Appointments and Promotions Committee 1989-present; Chairman 1993-1999, member 1999 to present.
3. Vivarium subcommittee of the Baylor Biosafety Committee, 1981-1990
4. Member, Baylor Institutional Review Board for Human Research, 1976-1980
5. Chairman, Committee on Electives, UNC School of Medicine, 1973-1974
6. Student Advisor, Class of 1974, UNC School of Medicine, 1970-1974
7. Chairman, Committee on Infection and Environmental Control, NC Memorial Hospital, Chapel Hill, 1969-1974
8. Chairman, Hospital Infections Committee, Gravelly Hospital, 1971-1974
9. Member, Baylor Allied Health Professions Committee, 1990 - 1996
10. Member, Baylor Public Affairs Advisory Committee, 1990 - present

Current Research Interests - The goals of current research efforts are to determine the role of respiratory viruses as causes of infections with serious consequences (**hospitalization**) - particularly for patients with underlying conditions - and to evaluate methods for control of these infections.

Evaluate immunization of children with live attenuated influenza vaccines to control community epidemics with the potential for controlling pandemics by "herd immunity".

Explore maternal immunization as an approach to control serious infections of the neonate and early infancy by passive immunity.

BIBLIOGRAPHY

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2. Glezen WP, George A, Belden EA, and Chin TDY. Quantitative relationship of pre-existing homotypic antibodies to the excretion of attenuated poliovirus Type 1. **Am J Epidemiol** 83:224, 1966.
3. Glezen WP, Hines MP, Kerbaugh M, Green ME, and Koomen J, Jr. Salmonella in two poultry processing plants. **J Am Vet Med Assoc** 148:550, 1966.
4. George C, McCollough RH, Doto IL, Todd J, Glezen WP and Chin TDY. ECHO 4 illness.

Epidemiological, clinical and laboratory studies of an outbreak in a rural community. **Am J Epidemiol** 84:253, 1966.

5. Glezen WP, Thornburg G, Chin TDY, and Wenner HA. Significance of mycoplasma infections in children with respiratory disease. **Pediatrics** 39:516, 1967.

6. Saliba GS, Glezen WP, and Chin TDY. Etiologic studies of acute respiratory illness among children attending public schools. **Amer Rev Resp Dis** 95:592-602, 1967.

7. Stites DP and Glezen WP. Pulmonary nocardiosis in childhood. A case report. **Am J Dis Child** 114:101, 1967.

8. Glezen WP, Clyde WA, Jr, Sheaffer CI, Senior RJ and Denny FW. Group A streptococci, mycoplasmas, and viruses associated with acute pharyngitis. **JAMA** 202:119, 1967.

9. Glezen WP, Wulff H, Lamb GA, Ray C, Chin, Tom DY and Wenner, HA. Patterns of virus infections in families with acute respiratory illnesses. **Am J Epidemiol** 86:350, 1967.

10. Saliba GS, Glezen WP, and Chin TDY. *Mycoplasma pneumoniae* infection in a resident boys' home. **Am J Epidemiol** 86:408, 1967.

11. Loda FA, Clyde WA, Jr, Glezen WP, Senior RJ, Sheaffer CI and Denny FW. Studies on the role of viruses, bacteria and *M. pneumoniae* as causes of lower respiratory tract infections in children. **J Pediatr** 72:161, 1968.

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18. Loda F, Glezen WP, and Clyde WA, Jr. Respiratory disease in group day care. **Pediatrics** 49:428-437, 1972.

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heterotypic protection against influenza A/Taiwan/86 (H1N1) by attenuated and inactivated vaccines to A/Chile/83-like viruses. **J Infect Dis** 163:300-304, 1991.

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